

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

IN RE: Clive L. Burnett
Imodale L. Burnett

Case No. 08-33010
Chapter 13

Debtors,

Clive L. Burnett
Imodale L. Burnett

Movants,

.

MOTION TO INCUR DEBT

Come now the Debtors, Clive L. Burnett and Imodale L. Burnett, by counsel, and respectfully request the authority of this Court to incur debt to purchase an automobile.

The Debtor represents unto the Court:

1. The Debtors filed a petition for relief under Chapter 13 of 11 U.S.C. on June 30, 2008.
2. The Debtors are in need of replacing the 1995 Crown Victoria..

Wm. C. Parkinson, Jr., Esquire
Wm. C. Parkinson, Jr., P.C.
Attorney for Clive L. Burnett
And Imodale L. Burnett
5310 Markel Road., Suite 200
Richmond, VA 23230
(804) 288-9026 VSB 14765

3. The Debtors have been approved by Professional Financial Services to purchase a 2006 Ford Taurus. The purchase to be financed by a loan in the amount of \$12,000.00 with interest at the rate of 25% payable \$350.00 a month for 48 months to be secured by a lien on the title to the replacement vehicle.
4. The incurring of a debt to finance the purchase of a replacement vehicle is in the best interest of all parties.

Wherefore the Debtor prays that this Honorable Court enter an order authorizing the Debtor to incur a debt by obtaining a loan not to exceed \$12,000.00 with an interest rate not to exceed 25 percent and with monthly payments not to exceed \$350.00 from Professional Financial Services to enable them to purchase a replacement vehicle.

Clive L. Burnett
Imodale L. Burnett

/s/ Wm. C. Parkinson, Jr.

By _____
Wm. C. Parkinson, Jr., Esquire
Wm. C. Parkinson, Jr., P.C.
Attorney for Clive L. Burnett
Imodale L. Burnett
5310 Markel Road, Suite 200
Richmond, VA 23230
(804) 288-9026 VSB 14765

CERTIFICATE

I hereby certify that on July 16, 2009, a true copy of the foregoing Motion To Incur Debt was mailed first class mail postage prepaid to the Debtor, the Standing Chapter 13 Trustee, the Office of the U.S. Trustee, all creditors and parties in interest as set forth on the attached mailing list.

/s/ Wm. C. Parkinson, Jr.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
_____ Division

In re: _____)
_____)
_____) Case No.
_____) Chapter
Debtor

NOTICE OF MOTION (OR OBJECTION)

_____ has filed papers with the court to _____.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before _____, you or your attorney must:

- ☐ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court

You must also mail a copy to:

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

- ☐ Attend the hearing on the motion (or objection) scheduled to be held on _____
_____ at _____ m. at United States
Bankruptcy Court, _____
_____.

If you or your attorney do not take these steps, the court may decide that you do not
oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: _____

Signature, name, address and telephone number
of person giving notice:

Virginia State Bar No. _____
Counsel for _____

Certificate of Service

I hereby certify that I have this _____ day of _____, 20 ____, mailed or
hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed
on the attached service list.

Office Of The U.S. Trustee
701 E Broad St., Suite 4304
Richmond, VA 23219

Aspire
P. O. Box 105341
Atlanta, GA 30348-5341

Aurora Loan Services
Attn: Bankruptcy Dept.
PO Box 1706
Scottsbluff, NE 69363-1706

Aurora Loan Services
c/o Shapiro And Burson
236 Clearfield Ave Ste 215
Virginia Beach, VA 23462-1893

Aurora Loan Services, LLC
6666 East 75th St.
Indianapolis, IN 46250-2872

Capital One
P.O. Box 30285
Salt Lake City, UT 84130-0285

Clive L. Burnett
Imodale L. Burnett
14907 Lansgate Court
Midlothian, VA 23112

Commonwealth Of Virginia
Dept. Of Taxation
P.O. Box 2156
Richmond, VA 23218-2156

eCAST Settlement Corporation
assignee of Capital One Bank
PO Box 35480
Newark, NJ 07193-5480

eCAST Settlement Corporation
assignee of Citibank USA/Home Depot
PO Box 35480
Newark, NJ 07193-5480

eCAST Settlement Corporation
assignee of HSBC Bank Nevada
PO Box 35480
Newark, NJ 07193-5480

Home Depot Credit Services
P. O. Box 689100
Des Moines, IA 50368-9100

Household Bank
P. O. Box 80084
Salinas, CA 93912-0084

HSBC Card Services
P. O. Box 80084
Salinas, CA 93912-0084

IRS
Centralized Insolvency Operations
PO Box 21126
Philadelphia, PA 19114-0326

Juniper Bank
P. O. Box 13337
Philadelphia, PA 19101-3337

LVNV Funding LLC
c/o Resurgent Capital Services
P.O. Box 10587
Greenville, SC 29603-0587

National Capital Management, LLC
8245 Tournament Dr Ste 230
Memphis, TN 38125-1741

Portfolio Recovery Assoc LLC
P. O. Box 41067
Norfolk, VA 23541-1067

Recovery Management Systems Corp
25 SE 2nd Ave Ste 1120
Miami, FL 33131-1605

Robert E. Hyman, Trustee
Served by electronic mail

Service Finance Company
1956 NE 5th Ave #8
Boca Raton, FL 33431-1067

Service Finance Company, LLC
DB50 HVAC Trust 2005-1
P.O. Box 29352
Phoenix, AZ 85038-9352

State Of New Jersey
Division Of Taxation Bankruptcy Un
P.o. Box 245
Trenton, NJ 08695

State Of New Jersey
Dept of the Treasury Tax Division
P.o. Box 245
Trenton, NJ 08695

WaMu
P.O. Box 660433
Dallas, TX 75266-0433

Washington Mutual Bank, FA
P.O. Box 99604
Arlington, TX 76096-9604

Washington Mutual Card Svcs.
Attn: Bankruptcy Dept.
P.O. Box 9016
Pleasanton, CA 94566-9016

Wells Fargo Financial
9710 Midlothian Turnpike
Richmond, VA 23235-4962

Wells Fargo National Bank
Attn: Payment Processing
P.O. Box 14487
Des Moines, IA 50306-3487

Wells Fargo Virginia Inc.
4137 121st Street
Urbandale, IA 50323-2310

Wells Fargo Visa Platinum
800 Walnut St
Des Moines, IA 50309